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LAST CHANCE BUYS, INC.
OLUWATOSIN AJIBOYE a/k/a ZOE AJIBOYE a/k/a ZOE AERIN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ADOBE SYSTEMS INCORPORATED,

Plaintiff,

v.

LAST CHANCE BUYS, INC., a Florida
Corporation; OLUWATOSIN AJIBOYE a/k/a
ZOE AJIBOYE a/k/a ZOE AERIN, an
Individual; and DOES 1-10, Inclusive,

Defendants.

Case No.: 3:15-cv-05038-HSG

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE**

Current Date: 3/1/2016
Proposed Date: 3/29/2016

Plaintiff ADOBE SYSTEMS INCORPORATED ("Plaintiff"), through its counsel of
record, and Defendants LAST CHANCE BUYS, INC., and OLUWATOSIN AJIBOYE a/k/a

1 ZOE AJIBOYE a/k/a ZOE AERIN (collectively “Defendants”), through their counsel of record,
2 hereby stipulate and request that the Case Management Conference set for March 1, 2016, be
3 continued to March 15, 2016, or a date thereafter convenient to the Court.

4 On February 2, 2016, the Court held an initial Case Management Conference, at which
5 time no trial or pretrial dates were set. At that time, the Parties represented that they were in the
6 midst of settlement discussions, but Plaintiff was awaiting additional documentation from
7 Defendants. Defendants’ counsel represented that the documents would be produced within two
8 weeks, and the Court then continued the Case Management Conference to March 1, 2016, to give
9 the Parties time to produce and review these additional documents and potentially resolve this
10 matter without further intervention from the Court.

11 Defendants, however, were delayed in producing these additional documents and did not
12 do so until Saturday, February 20, 2016. Plaintiff was unable to download and begin reviewing
13 the hundreds of pages of documents until Monday, February 22, 2016. Plaintiff is diligently
14 reviewing the multitudes of documents, but it is unlikely that any meaningful settlement
15 discussions will be able to be had prior to the deadline to file an updated Case Management
16 Statement, which is February 23, 2016.

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1 Therefore, the Parties hereby stipulate and respectfully request that the Court continue the
2 Case Management Conference to March 29, 2016, or a date thereafter convenient to the Court's
3 calendar.

4 DATED: February 22, 2016

JOHNSON & PHAM, LLP

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6 By: /s/ Nicole L. Drey
Nicole L. Drey, Esq.
Attorneys for Plaintiff
ADOBE SYSTEMS INCORPORATED

8 DATED: February 22, 2016


QUINTILONE & ASSOCIATES

10 By: /s/ Alvin B. Lindsay
Alvin B. Lindsay, Esq.
Attorney for Defendants
LAST CHANCE BUYS, INC.
12 OLUWATOSIN AJIBOYE a/k/a ZOE AJIBOYE
13 a/k/a ZOE AERIN

15 **ORDER**

16 Pursuant to Stipulation, the Case Management Conference set for March 1, 2016, is
17 hereby continued to March 29, 2016.

19 DATED: February 25, 2016

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Hon. Haywood S. Gilliam, Jr.
United States District Judge